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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Mercedes Rojas,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:18-cv-00538-JCM-NJK

Stipulation to Stay

(First Request)

The parties, through their respective counsel, hereby stipulate to stay this matter. The parties are in active settlement negotiations and believe they will be able to resolve this matter without continued litigation. This is the parties' first request to stay this matter, and the stipulation is not sought for purposes of delay. Rather, the parties request a stay to permit them to focus their time and resources on settlement discussions. After conferring, the parties believe a stay of 60 days, or until **February 11, 2019**, should be sufficient.

While the parties are optimistic they will be able to resolve this matter, they reserve the opportunity to request an early settlement conference with either the assigned magistrate judge or another magistrate judge, as determined by the Court, should they be unable to resolve this matter during the course of the stay. To that end, the parties' also request that the Court schedule a status conference, to be automatically vacated in the event of resolution, shortly after expiration of the stay. In advance of the status conference, the parties will, if necessary, submit a joint status report indicating whether an early settlement conference would be beneficial.

1 **WHEREFORE**, the parties respectfully request that this stipulation be granted and
2 the case stayed until **February 11, 2019**, and that the Court set a Status Conference, at a time
3 and date convenient to the Court, shortly after expiration of the stay.

4 Dated this 13th day of December 2018.

5 GERALD I. GILLOCK & ASSOCIATES

6 s/ Jessica M. Goodey
7 GERALD I. GILLOCK, ESQ.
8 JESSICA M. GOODEY, ESQ
9 428 South Fourth Street
10 Las Vegas, NV 89101
11 Attorneys for Plaintiff

DAYLE ELIESON
United States Attorney

12 s/ Mark E. Woolf
13 MARK E. WOOLF
14 Assistant United States Attorney
15 Attorneys for the United States

16 GRANTED. If dismissal papers have
17 not been filed, a status report shall
18 be filed by February 11, 2019.

IT IS SO ORDERED:

19 
20 _____
21 ~~UNITED STATES DISTRICT JUDGE~~
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: December 14, 2018
24 _____